

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES  
LLC, MONTGOMERY TECHNOLOGIES  
LLC, VIRGIL QUANTITATIVE  
RESEARCH, LLC, VIRGIL CAPITAL LLC,  
and VQR PARTNERS LLC,

Defendants.

**Case No.: 20-cv-10849 (JGLC)**

**JOINT STIPULATION**

Petitioner Robert A. Musiala, Jr. in his capacity as the Court-appointed receiver (“Receiver”), by and through his attorneys of record, and non-party respondents Nasir Adaya and Phuong Nguyen (“Respondents”), make the below stipulation:

WHEREAS, on August 4, 2023, the Receiver filed a motion to compel the turnover of the Disputed Assets (“Motion”);

WHEREAS, on September 8, 2023, the Receiver and Respondents filed a Joint Stipulation setting forth the briefing schedule related to the Motion, which the Court so-ordered on September 11, 2023;

WHEREAS, pursuant to the Joint Stipulation, on October 27, 2023, Respondents filed their opposition to the Motion (“Opposition”) along with a Motion to Strike Portions of Document 254 (“Motion to Strike”);

WHEREAS, due to changes in his counsel’s schedule, the Receiver has requested an extension to file his reply to the Opposition (“Reply”) as well as his opposition to the Motion to Strike;

WHEREAS, the Receiver and Respondents have met and conferred to address these requests;

**NOW THEREFORE, IT IS HEREBY STIPULATED**, subject to Court approval and order, and agreed to by and between the Receiver and Respondents, through their respective counsel of record, that:

1. The previous briefing schedule shall be amended;
2. The Receiver shall be permitted to submit his Reply in further support of the Motion along with his Opposition to the Motion to Strike by December 1, 2023.
3. The Receiver will not oppose a request, if any, by the Respondents to file a sur-reply.

Dated: November 3, 2023  
New York, New York

Respectfully submitted,

**BAKER & HOSTETLER, LLP**

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*Attorneys for the Respondents*

\* \* \*

SO ORDERED:

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Hon. Jessica G.L. Clarke

November \_\_, 2023